

Economic Analysis Revision
July 1, 2008

~~**Task 2 and Task 3 are separate entities and only similar in the type of data used.~~

Formatted: Centered

Task 2

Goal: Understand different endpoints treatment of toxicity data.

- 1) Evaluate five endpoints: NOEC (chronic, no observed effect concentration), EC25 (chronic, effect concentration, 25% of population), NSEC (chronic, no significant effect concentration), NOEAC (acute, no observed adverse effect concentration), t – test (acute, pass/fail).
- 2) Import toxicity data into CETIS (except NSEC – will be provided by State Board once approved by EPA) and summarize results for each endpoint. This is not a compliance exercise, but mainly a survey to understand (for Water Boards and the public) the differences between each endpoint.
- 3) A representative sample between major municipal dischargers, minor municipal dischargers, major industrial dischargers, and minor industrial dischargers (Debra thinks secondary vs. tertiary dischargers would also work as long as dilution credits are also considered) will be employed. From these areas, a total of 160 WET tests will be obtained (by State Boards) for this endpoint analysis. The appropriate tests will be obtained by Water Board staff.

Commented [s1]: Rik, this is what Debra believes is the correct way to do this analysis.

Task 3

Goal: Assess compliance costs for toxicity policy.

- 1) ~~Compare the numeric limit criteria and the compliance measures to current NPDES permits. Generate a cost assessment for compliance costs using the NSEC method at the numeric limits.~~
- 2) ~~Water Board staff will obtain representative data for each wastewater treatment plant on the list for economic evaluation.~~

Commented [s2]: Rik, Debra believes that just comparing compliance costs between the current NPDES permit and our new standard is sufficient.

Commented [s3]: Debra believes the 25 treatment plants would be enough, but is interested to hear what Eloise has to say about the number of treatment plants needed to get a representative sample.

Commented [s4]: The idea for using just the compliance costs is that the NSEC hypothesis test did not exist before so a comparison of past compliance would not work.

Formatted: Bullets and Numbering